



PLACER COUNTY

AIR POLLUTION CONTROL DISTRICT

11464 B Avenue, Auburn, CA 95603 • (916) 889-7130 • FAX (916) 889-7107

Richard G. Johnson, Air Pollution Control Officer

June 24, 1997

Mr. Al Saraceni
A. Saraceni Sales and Service.
335 Vernon Street
Roseville, CA 95678

COPY

Subject: Comments on Proposed Rule 246, Natural Gas-Fired Water Heaters,

Dear Mr. Saraceni:

This is to express the District's appreciation for your interest in bringing your comments and concerns to our Board Hearing in Auburn on June 19, 1997. We realize that considerable time and effort were involved on your part. We believe that the Board understood that you were speaking on behalf of all Placer County citizens, who might have to either (1) accept lower recovery rates or incur higher costs for compliant water heaters, or (2) go outside the District to obtain a non-compliant unit, when Rule 246 became effective. As you heard at the Hearing, the Board told the District Staff to investigate the availability of natural gas-fired water heaters in the mid-size ranges for residential use.

The District will be sending you an announcement of the adoption of Rule 246 and a copy of the rule as adopted by the Board.

Sincerely,

A handwritten signature in cursive script that reads "Don Holkestad".

Donald M. Holkestad
Air Quality Engineer



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AIR POLLUTION CONTROL DISTRICT

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Rule 246 file

Richard G. Johnson, Air Pollution Control Officer

August 18, 1997

Mr. Al Saraceni
A. Saraceni Sales and Service.
335 Vernon Street
Roseville, CA 95678

Subject: Follow-up on Comments on Rule 246, Natural Gas-Fired Water Heaters.

Dear Mr. Saraceni:

This is a follow-up report to you, based on your concerns about the possible lack of suitable natural gas-fired water heaters in mid-range sizes. As you heard at the Hearing, the Board told the District Staff to investigate the availability of natural gas-fired water heaters in the mid-size ranges for residential use.

The staff contacted three manufacturers of water heaters, Rheem, State Industries and AO Smith. The enclosed copy of the August 14, 1997 report to the Board presents our findings. After the report was prepared, we received the information from Rheem and noted that 15 units in the 30 to 50 gallon capacity meet the California Low-NOx standard. The Board of Directors of the Air Pollution Control District accepted this report and our verbal comments concerning Rheem.

The District wishes to thank you for your concern for the citizens of Placer County, as expressed in your comments to the Board.

Sincerely,

Don Holkestad

Donald M. Holkestad
Air Quality Engineer

Enclosure: Report to Board of Directors, August 14, 1997



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AIR POLLUTION CONTROL DISTRICT

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MEMORANDUM

TO: Board of Directors, Placer County Air Pollution Control District

FROM: Donald M. Holkestad, Air Quality Engineer *Donald M. Holkestad*

AGENDA DATE: August 14, 1997

SUBJECT: Follow-Up Report - Adoption of New Rule 246, Natural Gas-Fired Water Heaters

Action Requested:

Receive and file. This is a follow-up report to address issues raised concerning the June 19, 1997 Public Hearing on the adoption of Rule 246.

Background:

During the June 19, 1997 Board Hearing, at which Rule 246 was adopted, the Board requested a report back, regarding water heater availability. This request was in response to public comments by Al Saraceni, owner of A. Saraceni Sales and Service, in Roseville. Mr Saraceni commented that it might be difficult for a person to obtain mid-size residential water heaters that meet the low-NOx emission standards required by Rule 246. "Mid-size" is generally in the heat input range between 30,000 and 60,000 BTU/hour. As a result, he said, persons needing new water heaters could be forced to buy larger units than they needed, to comply with the NOx standards. He presented a sales brochure for Bradford White water heaters, in support of his concern. Accordingly, the Board directed Staff to determine if this concern applies to other popular brands of water heaters.

Staff Report:

Staff contacted three other major water heater manufacturers, requesting brochures and product lists that would indicate models of natural gas-fired units that meet the South Coast AQMD standard for NOx emissions. (Rule 246 requirements are virtually identical to those in the SCAQMD version of the rule). Responses have been received from State Industries Inc. and A O Smith. A response is pending from Rheem.

State "Sidewall-Vent" water heaters, all meet the NOx standard, and are available in two categories, "Select" for high output and "Censible" for regular. A total of 11 units have listed heat input ratings from 36,000 to 55,000 BTU/hour. A similar assortment of unit sizes exist in their line of traditional vertical vent units.

A O Smith has 15 of 19 models of residential gas water heaters within the heat input limits for Rule 246 applicability that meet the NOx standard. They range in rating from 38,000 to 60,000 BTU/hour.

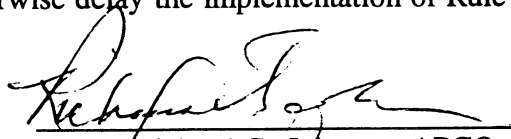
There is no reason to assume that a large manufacturer such as Rheem, would not also have a variety of models that will meet the NOx standard of Rule 246, to be competitive in the California market place.

Staff therefore concludes that (1) the concern for an adequate supply of complying water heaters in the mid-size range, does not relate to all manufacturers, and (2) there is no reason to amend the rule or to change the implementation date. These conclusions are supported by the apparent lack of any such concerns by the Gas Appliances Manufacturers Association, Inc., and also by the number of years this standard has been imposed in other larger air districts, apparently without significant impact upon the Public.

Recommendation:

That the District Board (1) accept this report as a complete and final response to the Board on this matter, and (2) instruct Staff to close any pending related actions to defer, modify or otherwise delay the implementation of Rule 246, now scheduled to begin January 1, 1998

Concur:


Richard G. Johnson, APCO

Attachment: Product Data Sheet photocopies from State Industries, Inc. and A O Smith.



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Richard G. Johnson, Air Pollution Control Officer

June 24, 1997

Mr. Otto Z. Vago
Chief Project Engineer
State Industries, Inc.
500 By-Pass Road
Ashland City, TN 37015-1299

COPY

Subject: Rule 246 Comments

Dear Mr. Vago:

This is to express our appreciation for the comments you recently submitted concerning the new Rule 246, Natural Gas-Fired Water Heaters. Your comments and suggestions were carefully considered, and passed on to our Board during the Hearing on June 19, 1997.

The Board took the following action relative to your comments that we (1) delay the effective date for Rule 246 to April 1, 1998, or later, and (2) apply the effective date (only) to the date of manufacture:

While the logic of your suggestions is sound from the viewpoint of State Industries and the other manufacturers, the distributors and the installers, in the opinion of the District, the effect would be to delay the NOx emission reductions to an uncertain future date. Our rules are reviewed by the California Air Resources Board and the United States EPA, and one important criterion that new rules must have, is the effective date of the NOx reductions and the quantity of the reductions. As you pointed out, the time interval from date of manufacture to date of installation could be as long as one year. Also, we have observed that some manufacturers are already providing "California, South Coast Certified" models which are already in stock in some shops in Placer County. To increase the time available for any existing non-compliant units to move through the distribution system, the Board agreed to change the rule effective date from October 1, 1997 to January 1, 1998.

The District will be sending you an announcement of the adoption of Rule 246 and a copy of the rule as adopted by the Board.

Sincerely,

Don Holkestad

Donald M. Holkestad
Air Quality Engineer



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Richard G. Johnson, Air Pollution Control Officer

June 24, 1997

Mr. Frank A. Stanonik
Director of Technical Services
GAMA
1901 North Moore Street
P. O. Box 9245
Arlington, VA 22209

COPY

Subject: Rule 246 Comments

Dear Mr. Stanonik:

This is to express our appreciation for the comments you recently submitted concerning the new Rule 246, Natural Gas-Fired Water Heaters. Your comments and suggestions were carefully considered, and passed on to our Board during the Hearing on June 19, 1997.

The Board took the following action relative to your three comments:

1. Section 102.2, Applicability, General - Have effective date refer to manufacturers, only.

While the logic of your suggestion seems to be sound from the viewpoint of the manufacturers, the distributors and the installers, in the opinion of the District, the effect would be to delay the NOx emission reductions to an uncertain future date. Our rules are reviewed by the California Air Resources Board and the United States EPA, and one important criterion that new rules must have, is the effective date of the NOx reductions and the quantity of the reductions. As you pointed out, the time interval from date of manufacture to date of installation could vary from a few weeks to a year. Also, we have observed that some manufacturers are already providing "California, South Coast Certified" models which are already in stock in some shops in Placer County. To increase the time available for any existing non-compliant units to move through the distribution system, the Board agreed to change the rule effective date from October 1, 1997 to January 1, 1998.

2. Section 401, Compliance Schedule - Allow at least six months from adoption to effective date.

(See above response for No. 1)



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Richard G. Johnson, Air Pollution Control Officer

June 24, 1997

Mr. Pat Martin
Astravan Distributors, Ltd.
123 Charles Street
N. Vancouver B.C.
Postal Code V7H 1S1

COPY

Subject: Rule 246 Comments and Applicability to Tankless Water Heaters

Dear Mr. Martin:

This is to express our appreciation for the comments, materials and specifications you recently submitted concerning the new Rule 246, Natural Gas-Fired Water Heaters, especially concerning the Bosch line of tankless water heaters. Your comments and suggestions were carefully considered by our District Staff, prior to our Board Hearing on June 19, 1997.

The District reviewed your request for exemption of tankless water heaters and the specifications you provided. We noted that the Models W400-K5 and W400-1K, have rated heat inputs greater than 75,000 BTU/hr, above the exemption threshold in the proposed Rule 246. The other model, W125-K, is supplied for LP gas fuel only, and would also be exempt from the proposed Rule 246. Accordingly, it appears that the units of concern are already exempt from all provisions of the rule. The District provided copies of your comments to the Board during the Hearing, but did not recommend any action relative to the tankless heaters, since it appeared that there was no longer a concern. Any water heater with a rated heat input greater than 75,000 BTU/hr or fueled with a fuel other than natural gas, or for use in recreational vehicles, swimming pools or hot tubs, is exempt from Rule 246.

The District will be sending you an announcement of the adoption of Rule 246 and a copy of the rule as adopted by the Board.

Sincerely,

Don Holkestad

Donald M. Holkestad
Air Quality Engineer